## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA )			
	)		
V .	)	CRIMINAL NO.	03-521-A
	)		
WILFRED MORRIS DILLARD,	)		
	)		
Defendant.	)		

## STATEMENT OF FACTS

The defendant, Wilfred Morris Dillard ("DILLARD"), was a Supply Technician, GS-6, at the Walter Reed Army Medical Center, at DeWitt Army Hospital, Fort Belvoir, Virginia, from October 21, 1991 through March 22, 2002.

From in or about December 1997, until in or about September 2002, defendant DILLARD planned and executed a scheme to steal computer printers and other computer equipment, which had been purchased with a government purchase card assigned to the defendant.

Defendant DILLARD ordered computer printers and other computer equipment from at least two vendors by telephone. These computer printers were charged to the government purchase card assigned to defendant DILLARD. The computer printers were usually laser jet printers, which were sold to the United States for an average cost of \$1,200.00 per unit. Defendant DILLARD took delivery of the computer printers and other computer

accessories at the computer vendor's place of business, using his personal vehicle.

Defendant DILLARD sold at least 461 computer printers and accessories to a business known to the United States Attorney. As a result of this scheme, defendant DILLARD received \$288,965.00 for the sale of computer printers and the computer equipment, which were the property of the United States.

From in or about December 1997, until in or about September 2002, in the Eastern District of Virginia, defendant WILLARD willfully, knowingly, and intentionally stole and converted to his own use computer printers and computer equipment with a value of \$288,965.38, the goods and property of the United States.

Respectfully submitted,

Paul J. McNulty United States Attorney

By:

Robert C. Erickson Assistant United States Attorney

I agree that the foregoing is true and correct.

Wilfred Morris Dillard Defendant

Reviewed and Approved:

Michael Nachmanoff, Esquire Counsel for Defendant